

## **EXHIBIT 21**

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION

Master File No. 3:07-cv-05944-SC  
MDL No. 1917

This document relates to:

*Electrograph Systems, Inc., et al. v. Hitachi,  
Ltd., et al.*, No. 11-cv-01656;

*Siegel v. Hitachi, Ltd., et al.* No. 11-cv-  
05502;

*Best Buy Co., Inc., et al. v. Hitachi, Ltd., et  
al.*, No. 11-cv-05513;

*Target Corp, et al. v. Chunghwa Picture  
Tubes, Ltd., et al.*, No. 11-cv-05514;

**DIRECT ACTION PLAINTIFFS' SECOND  
SET OF INTERROGATORIES TO THE  
THOMSON DEFENDANTS**

1 *Interbond Corporation of America v.*  
2 *Hitachi, et al.*, No. 11-cv-06275;

3 *Office Depot, Inc. v. Hitachi Ltd., et al.*,  
4 No. 11-cv-06276;

5 *CompuCom Systems, Inc. v. Hitachi, Ltd.,*  
6 *et al.*, No. 11-cv-06396;

7 *Costco Wholesale Corporation v. Hitachi,*  
8 *Ltd., et al.*, No. 11-cv-06397;

9 *P.C. Richard & Son Long Island*  
10 *Corporation, et al. v. Hitachi, Ltd., et al.*,  
11 No. 12-cv-02648;

12 *Schultze Agency Services, LLC, et al. v.*  
13 *Hitachi, Ltd., et al.*, No. 12-cv-02649;

14 *Tech Data Corporation, et al. v. Hitachi,*  
15 *Ltd., et al.*, No.13-cv-00157;

16 *Sharp Electronics Corp., et al. v. Hitachi,*  
17 *Ltd., et al.*, No. 13-cv-01173;

18 *Sharp Electronics Corp. et al. v. Koninklijke*  
19 *Philips Electronics, N.V., et al.*, No. 13-cv-  
20 02776;

21 *Siegel v. Technicolor SA, et al.*, No. 13-cv-  
22 05261;

23 *Sears, Roebuck & Co., et al. v. Technicolor*  
24 *SA, et al.*, No. 13-cv-05262;

25 *Best Buy Co., Inc., et al. v Technicolor SA,*  
26 *et al.*, No.13-cv-05264;

27 *Schultze Agency Services, LLC v.*  
28 *Technicolor SA, et al.*, No. 13-cv-05668;

*Target Corp., v. Technicolor SA, et al.*,  
No.13-cv-05686;

*Costco Wholesale Corporation v.*  
*Technicolor SA, et al.*, No. 13-cv-05723;

*Electrograph Systems, Inc., et al. v.*  
*Technicolor SA, et al.*, No. 13-cv-05724;

*P.C. Richard & Son Long Island*  
*Corporation, et al. v. Technicolor SA, et al.*,

1 No. 13-cv-05725;

2 *Office Depot, Inc., v. Technicolor SA, et al.,*  
3 No. 13-cv-05726;

4 *Interbond Corporation of America v.*  
5 *Technicolor SA, et al.,* No. 13-cv-05727

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**PROPOUNDING PARTIES:**

Direct Action Plaintiffs Electrograph Systems, Inc. and Electrograph Technologies Corp.; Alfred H. Siegel, solely as Trustee of the Circuit City Stores, Inc. Liquidating Trust; Best Buy Co., Inc., Best Buy Purchasing LLC, Best Buy Enterprise Services, Inc., Best Buy Stores, L.P., Bestbuy.com, L.L.C., and Magnolia Hi-Fi, Inc.; Target Corp., Sears, Roebuck, and Co., Kmart Corp.; Interbond Corporation of America; Office Depot, Inc.; CompuCom Systems, Inc.; Costco Wholesale Corporation; P.C. Richard & Son Long Island Corporation, MARTA Cooperative of America, Inc., and ABC Appliance, Inc.; Schultze Agency Services, LLC on behalf of Tweeter Opco, LLC and Tweeter Newco, LLC; Tech Data Corporation and Tech Data Product Management, Inc.; and Sharp Electronics Corporation and Sharp Electronics Manufacturing Company of America, Inc.

**RESPONDING PARTIES:**

Thomson SA and Thomson Consumer Electronics, Inc.

**SET:**

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1 PLEASE TAKE NOTICE THAT, pursuant to Rules 26 and 33 of the Federal Rules of  
2 Civil Procedure, the undersigned Direct Action Plaintiffs, through counsel, request that the  
3 Thomson Defendants (as defined herein) respond in writing, subscribed under oath, to the  
4 following interrogatories within 30 days of the date of service of this request.

5 **DEFINITIONS**

6 The words and phrases used in these interrogatories shall have the meanings ascribed to  
7 them under the Federal Rules of Civil Procedure and the Local Rules of the United States District  
8 Court for the Northern District of California. In addition, the following terms shall have the  
9 meanings set forth below whenever used in any interrogatory.

- 10 1. The words “all,” “any,” and “each” mean “each and every.”
- 11 2. The words “and” and “or” are both conjunctive and disjunctive as necessary.
- 12 3. The term “relevant period” means the period beginning March 1, 1995 through  
13 December 31, 2007.
- 14 4. The term “Thomson Defendants” refers collectively to Thomson SA and  
15 Thomson Consumer Electronics, Inc.
- 16 5. The terms “you” and “your” mean the Thomson Defendants and/or each of the  
17 Thomson Defendants, as defined herein.

18 **INSTRUCTIONS**

- 19 1. Pursuant to Federal Rule of Civil Procedure 33, you are required to answer the  
20 following interrogatories under oath within 30 days or within the time otherwise required by  
21 Court order.
- 22 2. You must serve a written response to the interrogatories, and such response must  
23 be signed. In answering the interrogatories, furnish all information available to you, including  
24 information in the possession of your attorneys and all persons acting on your behalf.
- 25 3. If you assert a claim of attorney-client privilege or attorney work product with  
26 respect to any of the interrogatories contained herein:

- 1           a. state the factual basis of the purported privilege or claim of work product in
- 2           sufficient detail so as to permit the Court to adjudicate the validity of the claim;
- 3           and
- 4           b. state the numbered interrogatory to which the privileged information is responsive.
- 5           4. If you object to any portion of any interrogatory, provide all information requested
- 6 by any portion of the interrogatory to which you do not object.
- 7           5. Each interrogatory requires full and accurate disclosure based on all available
- 8 information and all documents within your possession, custody, or control.
- 9           6. Whenever a date, amount, computation, or figure is requested, the exact date,
- 10 amount, computation, or figure is to be given unless it is unknown. If it is unknown, the
- 11 approximate or best estimate should be given and the answer should state that the date, amount,
- 12 computation, or figure provided is an approximation.
- 13           7. These interrogatories are continuing in nature to the extent provided in Rule 26(e)
- 14 of the Federal Rules of Civil Procedure, and to the extent that you, or your attorneys, agents or
- 15 representatives become aware of additional information responsive to this request subsequent to
- 16 their initial response, you are required to immediately provide such information requested herein.

### **INTERROGATORIES**

#### **INTERROGATORY NO. 1:**

If your response to any request for admission in Direct Action Plaintiffs' First Set of Requests for Admission to Thomson Defendants served with these Interrogatories is not an unqualified admission:

- (a) State the number of the request;
- (b) State all facts upon which you based your response;
- (c) Identify each person who has knowledge of those facts; and
- (d) Identify all documents that support your response

#### **INTERROGATORY NO. 2:**

Describe your ownership of the RCA brand name from the beginning of the relevant period through the present.

**INTERROGATORY NO. 3:**

Describe your use of the RCA brand name with respect to finished products sold by you in the United States from the beginning of the relevant period through the present.

**INTERROGATORY NO. 4:**

Describe your ownership of the Proscan brand name from the beginning of the relevant period through the present.

**INTERROGATORY NO. 5:**

Describe your use of the Proscan brand name with respect to finished products sold by you in the United States from the beginning of the relevant period through the present.

DATED: June 27, 2014

/s/ Philip J. Iovieno

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